

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

MOTION TO EXTEND TIME TO FILE DOCUMENTS

COMES NOW, Debtor, Sharon Baird, by and through her undersigned legal counsel, Peter Blust, Esquire, and respectfully represents to this Honorable Court, the following:

1. On October 12, 2017, this Court GRANTED Debtor until November 2nd, 2017 (Case Number **16-587-mdc**; Document Number **9**) to submit Incomplete Filings.
2. On October 2nd, Debtor requested an additional 9 days from due date of above Order, that is until Saturday, November 11, 2017, to file documents contained in this Court's above identified Order.
3. A subsequent Motion to Extend Time to File Incomplete Documents begged this Honorable Court's indulgence in permitting a brief six (6) day extension of time for Debtor to file documents until today, November 8, 2017; the Incomplete Documents list appears, *infra*,

here: (Incomplete Filings due by 11/2/2017. Atty Disclosure Statement due 11/2/2017. Chapter 13 Plan due by 11/2/2017. Schedules AB-J due 11/2/2017. Statement of Financial Affairs due 11/2/2017. Summary of Assets and Liabilities Form B106 due 11/2/2017. Chapter 13 Statement of Your Current Monthly Income and Calculation of Commitment Period Form 122C-1 Due 11/2/2017 Means Test Calculation Form 122C-2 Due: 11/2/2017. (W., Yvette)).

4. And then, once again, to November 11th, 2017, to file Debtors yet to be filed Incomplete Documents.
5. Since Friday evening, November 10th, undersigned counsel's attempts, using counsel's same computer used to file below/above referenced documents in Debtor's earlier filed Chapter 13 filing 17-10540, accessing the Eastern District's Bankruptcy website pages, since Friday, November 10, counsel has been unable to locate the prior provided "fill-in-the-blanks" screens for the near twenty-eight (28) separate pages required to supply the Court with Debtor's Chapter 13 Plan and supporting information supplied to the Court by Debtor using said "fill-in-the-blanks" forms supplied on the Court's website (including, but not limited to: Schedules AB-J, Statement of Financial Affairs, Summary of Assets and Liabilities Form B106 and Means Test Calculation, etc., *inter alia*).
6. Undersigned counsel continued, in vain, through yesterday to access the "fill-in-the-blank(s)" forms required via Court's Order on "Incomplete Documents" (Please see list at Paragraph 3 *supra*).

7. Under guidance from undersigned counsel, Debtor has funds available today to remit a first “Plan” payment to the Trustee, with sufficient funds presently available for a 2nd monthly proposed Plan payment as well; ready for remittance at whatever time set by the Trustee, and plan to supply both interim Debtor's proposed Plan payment, as well as whatever Plan payment is ultimately recommended by the Trustee and accepted by this Court.
8. Undersigned counsel has court matters to tend today in the Common Pleas Court of Montgomery County in Norristown and has out-patient hand surgery scheduled for Wednesday, November 15, 2017.
9. It is undersigned counsel's hope to make telephone contact with the Office of the Trustee this afternoon (undersigned counsel is relatively new to entirety of Chapter 13 participation and administration, vis a vis, help from the Trustee's Office aiding counsel(s) in shepparding their Debtor/client(s) through the process, has been frustrated by undersigned counsel's present inability to competently make proper use of the computer web pages made available by the Court, and the Trustee, to simplify counsel's supply of data to the Court, but intend to surmount the current challenges by week's end.
10. Undersigned counsel can make a 1st Plan payment to the Trustee as early as this afternoon – undersigned counsel hopes to make contact

with the Trustee's Office by 3:00p.m. this afternoon.

11. Counsel will then be unavaiable (hand surgery) Wednesday, and will make every attempt to gain tutelage on where counsel strayed from the proper path on the computer web pages to the correct "fill-in-the-blanks" pages that will accept the data counsel has from Debtor for supplying to this Honorable Court.

WHEREFORE, for the foregoing reasons, Debtor, and undersigned counsel, hereby respectfully request Extension of Time to File Documents due from November 2nd, 2017 to November 17, 2017.

BY: DEBTOR'S LEGAL COUNSEL,

/s/ Peter Blust, Esq. 11/14/2017
Signature of Attorney

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ORDER

IT IS HEREBY ORDERED that Debtor's incomplete filings, identified in the above-captioned case Document Number 9, are now due on or before November 17th, 2017.

BY THE COURT

Date:

United States Bankruptcy Judge